

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA and NEW YORK :
STATE, ex rel. IRINA GELMAN, DPM, :

Case No.: CV 12-5142

Plaintiffs, :

v. :

GLENN J. DONOVAN, DPM, NEW YORK CITY :
HEALTH and HOSPITALS CORPORATION, and :
PHYSICIAN AFFILIATE GROUP OF NEW YORK, :
P.C., :

Defendants. :

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**REPLY DECLARATION OF JOSEPH V. WILLEY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

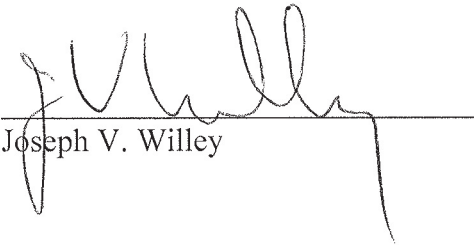
JOSEPH V. WILLEY declares under penalty of perjury, pursuant to 28 U.S.C. 1746, as follows:

1. I am an attorney admitted to practice before this Court and am a member of Katten Muchin Rosenman LLP, attorneys for defendants Glenn Donovan, D.P.M., New York City Health and Hospitals Corp., and Physician Affiliate Group of New York, P.C. (collectively, "Defendants") in this action. I respectfully submit this Reply Declaration in support of Defendants' motion to dismiss the Amended Complaint, pursuant to Fed. R. Civ. P. 9(b) and 12(b)(6).

2. Attached hereto as **Exhibit 1** is a true and correct copy of a webpage generated on the New York State Education Department's Office of the Professions' website, reflecting that Relator Irina Gelman, DPM obtained her license to practice podiatry on February 1, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2016 in New York, New York.



Joseph V. Willey